

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR
NEW YORK, NEW YORK 10017
TELEPHONE: (212) 750-7800
FACSIMILE: (212) 750-3906
E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ZACH INTRATER
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

November 3, 2020

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

On October 27, 2020, this Court held a sentencing hearing in the above-captioned case and sentenced Keith Raniere to, among other things, a prison term of 120 years. In light of the media interest in this case and due to the nature of the offense conduct and other matters discussed during the hearing, we request that the Court recommend to the Bureau of Prisons that Mr. Raniere be housed at a facility that has a special or sensitive needs unit (sometimes called a “drop-out yard”), such as USP Allenwood. Also, due to the fact that Mr. Raniere will want to meet with his lawyers during the appeal process, and because plane travel during the extended pandemic may be difficult, we further request that he be housed in a facility within an eight hour drive of New York City.

Respectfully,



Marc A. Agnifilo, Esq.
Teny R. Geragos, Esq.

cc: AUSA Tanya Hajjar (via ECF)